

MARQUIS AURBACH
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

Marquis Aurbach

Craig R. Anderson, Esq.
Nevada Bar No. 6882
Nicholas M. Adams, Esq.
Nevada Bar No. 15859
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
canderson@maclaw.com
nadams@maclaw.com

Attorneys for Defendant LVMPD

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MAUREEN GREENSTONE, individually
and as appointed Guardian of SETH DALE
GREENSTONE, an Adult Protected Person,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; VIDAL CONTRERAS and
DOES 1-10, inclusive,

Defendants.

Case Number:

2:23-cv-00290-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
DISPOSITIVE MOTIONS (FIRST
REQUEST)**

Defendant Las Vegas Metropolitan Police Department (“LVMPD”), by and through their attorney of record, Marquis Aurbach; Plaintiff Maureen Greenstone (“Plaintiff”), by and through her attorney of record, Peter Goldstein Law Corp.; and Defendant Vidal Contreras (“Defendant Contreras”), by and through his attorney of record, McNutt Law Firm, hereby stipulates and agrees to extend the deadline to file dispositive motions only.

I. CURRENT DEADLINES

The current deadline for the parties to file their dispositive motions is April 1, 2024.

II. REMAINING DISCOVERY TO BE CONDUCTED

The parties have conducted all discovery and discovery is closed.

III. REASONS FOR EXTENDING THE DEADLINES

The parties respectfully request to extend the deadline to file their dispositive motions for the following reasons:

1 1. Counsel for Defendant LVMPD just finished back-to-back trials in *Cepero v.*
2 *Bonkavich*, 2:11-cv-01421-JAD-NJK and *Herndon v. City of Henderson, et. al.*, A-21-
3 842739.

4 2. Counsel for Defendant LVMPD and Plaintiffs' counsel have a Ninth Circuit
5 oral argument set for April 2, 2024 in Pasadena, California in *Napouk v. LVMPD*, 23-15726
6 (9th Cir.).

7 3. Counsel for Defendant Contreras has a trial in the Eighth Judicial Business
8 Court set to begin on April 15, 2024, that is requiring their attention.

9 4. The parties agree that proper dispositive motion briefing will limit the issues
10 for trial or the need for trial.

11 **IV. PROPOSED EXTENDED DEADLINES**

12 The parties propose extending the deadline to file their dispositive motions thirty
13 (30) days from April 1, 2024 to May 1, 2024.

14 IT IS SO STIPULATED this 19th day of March, 2024.

15 MARQUIS AURBACH

PETER GOLDSTEIN LAW CORP.

16
17 By: /s/ Craig R. Anderson
18 Craig R. Anderson, Esq.
19 Nevada Bar No. 6882
20 Nicholas M. Adams, Esq.
Nevada Bar No. 15859
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorney for Defendant LVMPD

By: s/Peter Goldstein
Peter Goldstein, Esq.
Nevada Bar No. 6992
10161 Park Run Dr., Ste. 150
Las Vegas, Nevada 89145
Attorney for Plaintiff

21 MCNUTT LAW FIRM, P.C.

22
23 By: s/Matt Wolf
24 Dan McNutt, Esq.
25 Nevada Bar No. 7815
26 Matt Wolf, Esq.
Nevada Bar No. 10801
11441 Allerton Park Drive, Ste. 100
Las Vegas, Nevada 89135
Attorney for Defendant Contreras

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

ORDER

IT IS HEREBY ORDERED the deadline for the parties to file their dispositive motions is extended from April 1, 2024 to May 1, 2024.

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: March 25, 2024

MARQUIS AURBACH

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